

COUNTY OF SUFFOLK



STEVEN BELLONE
SUFFOLK COUNTY EXECUTIVE

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DEPARTMENT OF LAW

July 31, 2014

Magistrate Judge Arlene R. Lindsay
Long Island Federal Courthouse
814 Federal Plaza
Central Islip, New York 11722-4451

Re: Lisa Krolukiewicz and Kathleen Waithe v. The County of Suffolk, et al.
Docket No.: 13-CV-3860

Your Honor:

The undersigned represents the defendants in the above referenced matter, and I have conferred with Plaintiffs' attorney, Mr. David Rosenberg, regarding the following two applications.

One: We respectfully request Your Honor sign a confidentiality agreement which is annexed, hereto.

Two: We also respectfully request that you "So Order" the disclosure of two confidential investigative reports from the Suffolk County Police Department to plaintiffs' counsel, Mr. Rosenberg for purposes of this litigation. The plaintiffs previously filed complaints with their employer, the SCPD, regarding acts which are the subject of the present lawsuit. Two separate investigations were conducted internally. These reports, and all of the attachments contained within, are maintained as "confidential" by the police department, so as to protect witnesses, promote candor during interviews, and encourage all employees to file such complaints when they feel they have been wronged without fear of retaliation. The police department will, however, disclose the full contents of the files upon a court order. The parties to the action thereby request Your Honor order that the two investigative files be turned over in their entirety.

I thank the Court for Your Honor's timely attention to this matter.

Very truly yours,

Dennis M. Brown
Suffolk County Attorney

Megan O'Donnell
Megan O'Donnell
Assistant County Attorney

MOD/Ind
Attachment